

Message

**From:** Leea Anderson [LANDERSON@helenamt.gov]  
**Sent:** 5/9/2022 7:35:53 PM  
**To:** Llamozas, Emilio [Llamozas.Emilio@epa.gov]; Ed Coleman [ECOLEMAN@helenamt.gov]; Jeff Brown [JBROWN@helenamt.gov]; Garcia, Al [garcia.al@epa.gov]  
**Subject:** RE: Amended Decorative Industrial Plating Permit from the City of Helena  
**Attachments:** DIP Permit.2022.0428\_Draft.docx; DIP Monitoring Report Form.doc

Good afternoon Emilio,

Thank you for taking the time to review the amended DIP permit and for catching the incorrect value in the Arsenic monthly average local limit.

Attached is a draft amended permit and monitoring reporting form to address the issues noted in # 1, 3, and 4.

To address #2: Below is the table we used to calculate the copper allocation for DIP. We used an estimated daily flow of 225 gallons/day. We based that on DIP's average daily flow for days they discharge. At 225 gallons/day, using the 2.07mg/L from CFR 433.17, their Max Copper Load in lb/day would be .00388 lb/day. The City of Helena allocated copper based on the 1.1 times the max DMR reported copper value and the resulting 0.00344 lb/day is more stringent than 0.00388 lb/day and therefore was used.

		Worst Case Scenario		Average Conc. Scenario		Max Conc. Scenario		Copper
Industry	Estimated Daily Flow (gal/day)	Max Monthly Concentration (mg/L)	Max Copper Load (lb/day)	Average DMR Concentration (mg/L)	Average Copper Load (lb/day)	Max DMR Concentration (mg/L)	Average Copper Load (lb/day)	1.1 x Max DRM Concentration (mg/L)
Decorative Industrial Plating	225	2.07	0.00388	0.56	0.001048	1.67	0.003131	1.84

Please let me know if you see any issues with the new draft permit or monitoring reporting form or have any follow up questions.

If the attached documents look good, let me know and I will re-issue them.

Sincerely,

Leea Anderson  
Environmental Regulation Pretreatment Manager  
City of Helena- Public Works Department  
406-447-8096

---

**From:** Llamozas, Emilio <Llamozas.Emilio@epa.gov>  
**Sent:** Thursday, April 28, 2022 8:45 AM  
**To:** Ed Coleman <ECOLEMAN@helenamt.gov>; Leea Anderson <LANDERSON@helenamt.gov>; Jeff Brown <JBROWN@helenamt.gov>; Garcia, Al <garcia.al@epa.gov>  
**Subject:** RE: Amended Decorative Industrial Plating Permit from the City of Helena

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Ed,

Thanks for the update.

I will also be out of the office for the next two weeks. Your plan for Leea to check with the contractor and get back to us sounds great.

I hope you have a great time floating down the Grand Canyon.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

To report an environmental violation, please visit EPA's website at

<https://echo.epa.gov/report-environmental-violations>

---

**From:** Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>

**Sent:** Thursday, April 28, 2022 8:33 AM

**To:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>; Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Jeff Brown <[JBROWN@helenamt.gov](mailto:JBROWN@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>

**Subject:** RE: Amended Decorative Industrial Plating Permit from the City of Helena

Hi Al and Emilio,

Thanks for the feedback. We are still learning, so appreciate it. Leea will be getting you a response in the near future. We had assistance from a consultant in calculating the copper limit, so it may be a few days. As a heads up, I will be leaving to float the Grand Canyon tomorrow and will be out for the next three weeks. If anything comes up, please work with Leea and I will be back in the office May 23. Thanks

Ed Coleman

(406) 447-8059

---

**From:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>

**Sent:** Wednesday, April 27, 2022 4:27 PM

**To:** Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Jeff Brown <[JBROWN@helenamt.gov](mailto:JBROWN@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>

**Subject:** RE: Amended Decorative Industrial Plating Permit from the City of Helena

**Importance:** High

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Leea,

Thank you for providing a copy of the April 14, 2022 Industrial User Permit for Decorative Industrial Plating (DIP). Overall, the permit appears consistent with the City of Helena's local limits as recently approved by the EPA. However, we had a couple of comments/questions for you to consider below:

1. The arsenic monthly average local limit is 0.67 mg/L. The DIP permit has an arsenic monthly average local limit of 0.7 mg/L. The arsenic monthly average limit in the DIP permit should align with the arsenic monthly average limit in the local limits, i.e., it should be 0.67 mg/l. See attached spreadsheet.

2. The DIP permit has a copper monthly limit of 0.0034 lbs/day. Could you please provide the DIP average flow rate that was used to convert the 0.0034 lbs/day to mg/L. This calculation is to compare the copper 0.0034 lbs/day monthly limit to the Metal Finishing PSNS (433.17) monthly average limit of 2.07 mg/L. The more stringent of the two limits should be the one in the permit.
3. The DIP arsenic monthly average limit in the self-monitoring report attachment to the permit should be updated based on the information described in bullet 1 above.
4. Footnote 1 on page 3 of the DIP permit that references the in lieu of TTO monitoring was missing. See language below:  
[1] In lieu of monitoring for TTO, the facility may submit a Solvent Management Plan to the City, in accordance with Part 2B of this permit.

Al and I are available for a call, if you have any questions on the items above.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

To report an environmental violation, please visit EPA's website at

<https://echo.epa.gov/report-environmental-violations>

---

**From:** Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>

**Sent:** Thursday, April 14, 2022 7:31 AM

**To:** Jeff Brown <[JBROWN@helenamt.gov](mailto:JBROWN@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>; Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>; [paul@dipitnow.com](mailto:paul@dipitnow.com)

**Subject:** Amended Decorative Industrial Plating Permit from the City of Helena

Good Morning,

Attached is a copy of the Amended Industrial User Permit issued by the City of Helena to Decorative Industrial Plating. If you have any questions or concerns, please let me know.

Sincerely,

Leea Anderson

Environmental Regulation Pretreatment Manager

City of Helena- Public Works Department

406-447-8096

---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.